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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SALVADOR PLASCENCIA, individually; and
KYLE HAIL, individually,

Case No.: 2:22-cv-01420-GMN-VCF

Plaintiffs.

VS.

HARTFORD FIRE INSURANCE COMPANY,
a Connecticut Corporation; DOES, I through X,
inclusive; ROE BUSINESS ENTITIES, I
through X, inclusive,

**UNOPPOSED MOTION TO EXTEND
TIME TO RESPOND TO PLAINTIFFS'
COMPLAINT**

(First Request)

Defendants.

Defendant Hartford Fire Insurance Company (“Hartford”), by and through their undersigned counsel of record, Darren T. Brenner, Esq., and Lindsay D. Dragon, Esq., hereby submits the following Unopposed Motion to Extend Time to Respond to Plaintiff’s Complaint.

On July 22, 2022, Plaintiffs Salvador Plascencia and Kyle Hail (“Plaintiffs”) filed their Complaint with the Eighth Judicial District Court for the State of Nevada as Case No. A-22-855833-C [ECF No. 1-1]. Hartford removed the action to the United States District Court on August 31, 2022 [ECF No. 1]. Pursuant to Fed. R. Civ. P. 81(c)(2)(C), Hartford has 7 days from the removal to file its response to the Complaint, which makes the current deadline September 7, 2022. Hartford’s counsel is still investigating the allegations raised in Plaintiff’s Complaint. Further, Hartford’s counsel will be out of the office for the upcoming Labor Day weekend.

In light of the circumstances, Hartford's counsel conferred with Plaintiffs' counsel regarding the proposed extension, and counsel for Plaintiffs agreed to extend the deadline for Hartford to respond to the Complaint to September 22, 2022.

Accordingly, Hartford hereby moves to extend the deadline to respond to Plaintiffs' Complaint to September 22, 2022. This is the first request for an extension of time, which is requested in good faith and is not for purposes of delay or prejudice to any other party.

DATED this 1st day of September, 2022.

WRIGHT, FINLAY & ZAK, LLP

/s/ Lindsay D. Dragon

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Attorneys for Defendant, Hartford Fire Insurance Company

IT IS SO ORDERED.

DATED: 9-19-2022

UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b) and Electronic Filing Procedure IV(B), I certify that on the
1st day of September, 2022, a true and correct copy of the foregoing **UNOPPOSED MOTION**
TO EXTEND TIME TO RESPOND TO PLAINTIFFS' COMPLAINT was transmitted
electronically through the Court's e-filing electronic system to the attorney(s) associated with this
case.

/s/ Jason Craig
An Employee of WRIGHT, FINLAY & ZAK, LLP